

## **Low Power Mode/Set-back Controls**

While we have no concerns with low power mode/set-back controls being required as part of the ENERGY STAR specification, we do take exception with the access to those controls. If these controls are mandated, they should be accessed by the bottler/distributor and equipment owner(s) only rather than by the customer/outlet.

## **Future Specifications Revisions**

We believe that the verbiage on future specifications revisions should be altered to clarify EPA's position relative to existing equipment in the marketplace. We would request EPA's assistance—through program roll-out and education—in communicating, both to our customers and outside stakeholders in the environmental community, that the program will apply to equipment at the time it is placed in the marketplace as new equipment. There should be broad understanding in the difficulty of replacing all existing equipment with ENERGY STAR qualifying machines. Perhaps there is an opportunity to include energy-efficiency opportunities for retrofitting/refurbishing in roll-out communications.

## **Tier I vs. Tier II Specifications**

We have a general concern about multiple tiers, which we believe will make program management/administration more complex (both at the agency and on a company level). We would propose a single specification rather than multiple tiers. Particularly if EPA reserves the right to make specification changes in the future, the tiered system might lose meaning.

## **Location/Use of the ENERGY STAR logo**

Use and location of the ENERGY STAR logo will undoubtedly have an impact on the “new vs. existing” equipment issue. Our preference would be to coordinate a “soft” roll-out of this program as it relates to logo usage. We would propose requiring logo placement on the back of a machine, with the option of more prominent usage at the discretion of the equipment manufacturer, purchaser and outlet. In short, it should be up to the discretion of the partners (vending machine manufacturers, beverage companies and bottlers) to use the logo (we should be allowed to use it, but not obliged). After a two-or three-year period, the logo usage requirement could be revisited, with the potential for requiring prominent placement of the logo.